

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
MINNEAPOLIS DIVISION**

JAMES FUTRELL and CHRIS
ROGERS, each individually and on behalf
of all others similarly situated,

v.

CARGILL, INCORPORATED

Case No. 0:22-cv-00969-JRT-TNL
FLSA Collective Action
FED. R. CIV. P. 23 Class Action

Judge John R. Tunheim

Magistrate Judge Tony N. Leung

**PLAINTIFFS' UNOPPOSED
MOTION TO APPROVE SETTLEMENT AGREEMENT**

Plaintiffs request the Court approve the settlement reached in this Fair Labor Standards Act (FLSA) case. The Settlement Agreement represents the culmination of Plaintiffs' and Plaintiffs' counsel's investigation, litigation, and negotiation. It completely resolves Plaintiffs', and the rest of the proposed collective's, claims at issue in this lawsuit. The settlement is fair and reasonable, and it will provide meaningful relief to Plaintiffs and the similarly situated employees of Cargill who opt-into the Settlement, in light of the inherent risks of litigation and trial. Cargill has defended the claims in this lawsuit and continues to deny any wrongdoing, the violation of any federal or state wage-and-hour law, and any damages at issue.

For these reasons, settlement of this matter is in the best interest of Plaintiffs and the proposed collective members. Plaintiffs request the Court approve the Parties' Settlement Agreement, including notice to the proposed collective, and dismiss the alleged claims with prejudice.

The motion is supported by the accompanying memorandum and exhibits.

Respectfully submitted,

/s/ Matthew S. Parmet

By: _____

Matthew S. Parmet

TX Bar # 24069719

(admitted pro hac vice)

PARMET PC

2 Greenway Plaza, Ste. 250

Houston, TX 77046

phone 713 999 5228

matt@parmet.law

Andrew R. Frisch

FL Bar # 027777

(admitted pro hac vice)

MORGAN & MORGAN, P.A.

8581 Peters Road, 4th Floor

Plantations, FL 33324

Phone: (954) WORKERS

Email: afrisch@forthepeople.com

Rolf T. Fiebiger

MN Bar # 0391138

FIEBIGER LAW LLC

6800 France Ave. S., Ste. 190

Edina, MN 55435

phone (612) 888-6084

rolf@fiebigirlaw.com

Michael N. Hanna

MI Bar # P81462

MORGAN & MORGAN, P.A.

2000 Town Center, Suite 1900

Southfield, MI 48075

(313) 251-1399

mhanna@forthepeople.com

Attorneys for Plaintiffs